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d/b/a:
Frederick G. Griffin
Professional Corporation
In North Carolina

June 25, 2003

Ted Dempsey
Chairman, Implementation Subcommittee
NCC
144 Park Blvd.
Massapequa, NY 11758

Subject: National Need – Reflections

cc: FCC Docket 96-86

Ted,

After attending the recent Motorola consultant seminar, which you also attended, I then attended the ACPO National Homeland Security seminar in Washington, SC. I have come to the realization that what is going on in Docket 96-86 and the NCC is not meeting the national need. Things have changed and the FCC needs to recognize this and change course on the 700MHz band spectrum to support Homeland Security.

As things are and might be:

AS you and I both learned at the same time, the APCO P25 standard is not a standard at all in the normal context. It is a vendor contracting infrastructure document. This arises out of the vendor option for three feature sets; mandatory, optional and value added. What this means is that the subscriber manufacturers are at the mercy of the infrastructure supplier. AT this time one – Motorola.

Two other defects existing at this time are: First – the lack of console interface documents thus console suppliers are locked and at the mercy of the infrastructure supplier, second – there are no intersystem documents so that two adjacent systems have no assurance of being connected on an open standards basis.

The funding at the Federal level is being directed toward APCO P25 systems directly. Redoing what was done in the past with fixed location frequencies with the results of the above is that what is evolving is an uncontrolled, unregulated monopoly, and hence what we are seeing is the APCO P25 system costs 22% - 55% above other comparable systems.

What then does the nation need?

The nation needs:

- The ability to float frequencies where they are needed (like cellular, PCS and Nextel).
- The separation of government infrastructure control from vendors to users.
- The ability to transport subscriber units nationwide, like cellular, PCS, and Nextel.
- Critical communications infrastructure not being used as a pawn in the political process.
- A purchasing / user organization on parity with vendors in technical management and control.

Reality:

- The national government networks are dynamic in evolution, implementation, and operation.
- Networking [interoperability] cannot be achieved by the way things were done in the past.
- Networking [interoperability] cannot be achieved utilizing static industry standards that take years if not decades to develop.

The solution:

The frequency and infrastructure [not subscribers] needs to be under the auspice of national/regional structuring.

With my new enlightenment and the changes as a result of the events of 9/11, I cannot support the fixed static regional planning process.

A new and different methodology regulatory structure must be found for the good of the nation.

Sincerely,

A handwritten signature in blue ink that reads "Frederick G. Griffin, P.E.".

Frederick G. Griffin, P.E.
President

FGG/cft